

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking into the Review
of the California High Cost Fund B Program.

Rulemaking 06-06-028
(Filed June 29, 2006)

**DRAFT CASF WORKSHOP REPORT COMMENTS OF COMCAST
PHONE OF CALIFORNIA, LLC**

Comcast Phone of California, LLC ('Comcast Phone'), by its attorney and in response to Telecommunications Staff Direction, hereby submits its Comments on the draft California Advanced Services Fund ("CASF") Workshop Report. In its post workshop comments and at the workshop, itself, Comcast Phone expressed its support for the new CASF program, furthering the important public policy goal of expanding broadband in California in unserved and underserved areas. To that end, Comcast made a number of important recommendations in its post workshop comments concerning applicant requirements and the scoring criteria and incorporates those recommendations by this reference herein. Comcast Phone's comments, *infra*, are targeted to specific corrections to be made in the draft report to correctly state Comcast Phone's position and to its view of the post-workshop comments of other parties.

A. Specific Workshop Report Corrections Should Be Made.

Certain specific workshop items should be corrected. First, at page 5 of the draft report, it states that "Comcast commented that the shapefile would provide the specificity within 50 miles that a list of CBGs would not." This is an innocent error in transcribing the comments of Comcast Phone's representative at the workshop. The statement that was made at the workshop and which should be reflected in the final report is that

“Comcast commented that a shapefile detail a 50 mile area which would provide more specificity than a list of CBGs.”

The second bullet point in the Comcast Phone section of the draft report (at page 22) states, “Applicant should provide total retail price excluding discounts and promotions, minimum contract terms, and equipment lease information.” This is an error. The Comcast Phone post-workshop comments reflect the opposite. As stated therein, customers choose either to own or lease equipment. As a result, a blended price on an annualized basis of the full retail rate for service and equipment (taking into consideration both ownership and lease charges) should be developed to account for this pattern of customer behavior.

Finally, the third bullet point in the Comcast Phone Section of the draft report on page 22 reflects the imprecise statement that “Standardized proxy server[s] not available to the public be set up to test speeds.” For accuracy, both as to what Comcast Phone said and for the measurement process contemplated by the report, this statement should be modified to read, “Standardized proxy servers not available to the public, but only to CASF applicants, with testing and audits administered by the CPUC, need to be established to determine test speeds.”

B. Comcast Phone Supports Certain Recommendations Of Other Parties.

Certain AT&T recommendations concerning the application process should be adopted. For example, AT&T opposed the requirement to include a description of the applicant’s current infrastructure within 100 miles of the proposed project. Draft Report at 14. Comcast Phone agrees with this position and suggests that a general description of

the applicant's adjacent broadband infrastructure would suffice to demonstrate how the proposed project complements and extends the applicant's current broadband service.

AT&T also proposed that the first round of applications be limited to unserved areas to maximize the benefits of the CASF program. As Comcast Phone has previously stated, following this principle will ensure that initial CASF funding will go to areas that unquestionably are deserving of subsidy as opposed to areas that may be the subject of contention from parties as to whether they really are "underserved."

TURN recommended that the number of potential broadband subscribers be based upon the number of households in a proposed service area. Likewise, Verizon suggested that an independent data base (not controlled by the applicant) be used to determine potential broadband subscribers. Both of these comments are consistent with Comcast Phone's recommendation that Census Block Group household data be used to estimate the number of potential broadband subscribers on a households passed basis.

C. Other Recommendations Made By Parties Should Be Rejected.

AT&T also recommended that the Commission modify the application requirements to allow an applicant to include an area as an unserved area if it is only 75% unserved. Draft Workshop Report at 15. This recommendation should be rejected because it would modify the definition of unserved and underserved as adopted by the Commission in D.07-12-054. Further, as noted above, it would clash with the recommendation that only unserved areas be available for application in the initial round.

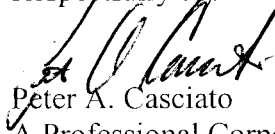
Both TURN and DRA recommended that applicants be penalized, through a reduction in funding, if the speeds proposed in an application are not achieved once the project is completed. This suggestion is a bit too draconian. As noted by a number of

workshop participants, variances in speed could arise for reasons beyond the control of parties. As a result, a process should be available to account and correct those differences so as to avoid any penalties or fund withholding.

Conclusion

Comcast Phone recommends that the clarifications and changes proposed herein should be included in the Final Workshop Report.

Respectfully submitted,



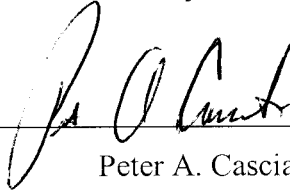
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Dated: March 3, 2008

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CERTIFICATE OF SERVICE

I, Peter A. Casciato, hereby certify that copies of the foregoing "Draft CASF Workshop Report Comments of Comcast Phone of California, LLC" have been served on those listed on the electronic service list for R.06-06-028, by electronic mail, as a PDF attachment, this 3rd day of March, 2008.



Peter A. Casciato



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